Exhibit I

Ariana Lindermayer

From: Ahmad Keshavarz <ahmad@NewYorkConsumerAttorney.com>
Sent: Monday, December 09, 2013 1:20 PM
To: 'Lloyd Weinstein'; Ariana Lindermayer; 'Deborah Ali'
Cc: lsglawoffices@verizon.net; Carolyn E. Coffey; 'Michael Pereira'
Subject: RE: FW: Tuhin v New York Motor Group, Inc., M&T Bank, et.al - 26(f) report and questionaire
Attachments: 2013-12-04 26f report - corrected 3.pdf

Dear Counsel,

As you know, the parties had agreed to the terms of the attached Rule 26(f) report. We are awaiting the signatures of defendants. Two things Defendants had agreed to was: 1) retaining documents related to the sale, financing, etc. of the vehicle, and 2) emailing the same today in aid of settlement.

I have asked on a few occasions know for Defendants to sign the attached Rule 26(f) report with the terms they have orally agreed to.

I have also been waiting for counsel for the dealership to confirm the existence of the video/audio recordings of the sale that the dealership told my client they were making. That would quickly narrow the factual issues in dispute.

As to damages, as we indicated in our telephone calls, damages are an item to be disclosed in the initial disclosures. If Defendants want the disclosures prior to the hearing, I have revised the 26(f) report to reflect the same.

Similarly, the initial disclosures will disclose the existence of potential insurance coverage, regardless if the parties subjectively believe there is coverage or whether or not they have submitted a claim to the carrier. Are there any such policies? I believe I have asked from the beginning of the case.

As to a motion to dismiss, your client is certainly at liberty to seek leave to file as many motions as you believe appropriate. Your client has every right to vigorously litigate this case as it deems proper. I do not take issue with its right to do that. However, we have filed suit under fee shifting consumer protection statutes. If we prevail, we will be entitled to mandatory reasonable attorney's fees and costs. At that point, your client's decision to engage in motion practice will become relevant. A maxim in fee-shifting cases is that Defendant "cannot litigate tenaciously and then be heard to complain about the time necessarily spent by plaintiff in response." See Copeland v Marshall, 641 F2d 880, 904 (DC Cir 1980) (en banc), citing Wolf v Frank, 555 F2d 1213, 1217 (5th Cir 1977) ("Obviously, the more stubborn the opposition the more time would be required" by the other side); Perkins v New Orleans Athletic Club, 429 F Supp 661, 667 (ED La1976) ["Those who elect a militant defense ... (are responsible for) the time and effort they exact from their opponents"]. "While [defendant] is entitled to contest vigorously [plaintiff's] claim, once it does so it cannot then complain that the fees award should be less than claimed because the case could have been tried with less resources and with fewer hours expended." Henson v. Columbus Bank & Trust Co., 770 F.2d 1566, 1575 (11th Cir. 1985).

I look forward to receiving the signed 26(f) report as defense counsel have previously promised. If you have questions or concerns, please let me know. Thanks

The Law Office of Ahmad Keshavarz
16 Court St., 26th Floor, Brooklyn, NY 11241-1026
Phone: (718) 522-7900 Fax: (877) 496-7809
Website: www.NewYorkConsumerAttorney.com
Email: ahmad@NewYorkConsumerAttorney.com
Debt collection violations * Identity Theft * Deceptive car sales & financing scams

From: Ahmad Keshavarz [mailto:ahmad@NewYorkConsumerAttorney.com]
Sent: Tuesday, December 03, 2013 6:32 PM
To: 'Lloyd Weinstein'; 'Ariana Lindermayer'; 'Deborah Ali'

Cc: lsglawoffices@verizon.net; 'Carolyn E. Coffey'; 'Michael Pereira'
Subject: RE: FW: Tuhin v New York Motor Group, Inc., M&T Bank, et.al - 26(f) report and questionaire

Just caught a typo as to the date of initial disclosures; it is the 13th not the 6th.

The Law Office of Ahmad Keshavarz
16 Court St., 26th Floor, Brooklyn, NY 11241-1026
Phone: (718) 522-7900 Fax: (877) 496-7809
Website: www.NewYorkConsumerAttorney.com
Email: ahmad@NewYorkConsumerAttorney.com
Debt collection violations * Identity Theft * Deceptive car sales & financing scams

From: Ahmad Keshavarz [mailto:ahmad@NewYorkConsumerAttorney.com]
Sent: Tuesday, December 03, 2013 6:27 PM
To: ahmad@NewYorkConsumerAttorney.com; 'Lloyd Weinstein'; 'Ariana Lindermayer'; 'Deborah Ali'
Cc: lsglawoffices@verizon.net; 'Carolyn E. Coffey'; Michael Pereira
Subject: RE: FW: Tuhin v New York Motor Group, Inc., M&T Bank, et.al - 26(f) report and questionaire

As per our call, attached are:

1. My handwritten notes on the questionnaire. Let me know if there are any concerns. If none, I will circulate a “clean copy.” Also, please let me know the date for item # 12; I would imagine it would be the same as # 11.
2. The proposed 26(f) report. If the language is agreed please either physically sign and email back to me or indicate I may put your “/s/” signature on the document. Of course, if there are any concerns you have or changes you would like, please let me know.

Thanks.

The Law Office of Ahmad Keshavarz
16 Court St., 26th Floor, Brooklyn, NY 11241-1026
Phone: (718) 522-7900 Fax: (877) 496-7809
Website: www.NewYorkConsumerAttorney.com
Email: ahmad@NewYorkConsumerAttorney.com
Debt collection violations * Identity Theft * Deceptive car sales & financing scams

From: Ahmad Keshavarz [mailto:ahmad@NewYorkConsumerAttorney.com]
Sent: Tuesday, December 03, 2013 5:21 PM
To: 'Lloyd Weinstein'; 'Ariana Lindermayer'; 'Deborah Ali'
Cc: lsglawoffices@verizon.net; 'Carolyn E. Coffey'
Subject: RE: FW: Tuhin v New York Motor Group, Inc., M&T Bank, et.al

Pursuant to Fed. R. Civ. P. 16 the parties submit to this Joint Rule 26(f) Report and Joint Proposed Scheduling Order.

1. The parties have considered and conferred as to the matters raised in Rule 26(f).

2. The parties agree to service via email for document up to 25 pages.

3. The parties agree to restate the discovery question prior to propounding an answer. The parties agree to exchange discovery requests via email.

4. Counsel will contact their clients to request that they retain electronic and other documents relevant to the parties, the alleged debt, the credit reporting/verification, the attempts to collect that debt and the claims and defenses raised in this lawsuit. To the degree possible, electronically stored information will be produced in both its electronic form and in a printed form. Pursuant to 26(f)(3)(D), the parties ask the court to include this agreement in an order.

Signed this ________ of __________________________, 2013

____
Hon. Sterling Johnson, Jr.
United States District Judge

The Law Office of Ahmad Keshavarz
16 Court St., 26th Floor, Brooklyn, NY 11241-1026
Phone: (718) 522-7900 Fax: (877) 496-7809
Website: www.NewYorkConsumerAttorney.com
Email: ahmad@NewYorkConsumerAttorney.com
Debt collection violations * Identity Theft * Deceptive car sales & financing scams

From: Ahmad Keshavarz [mailto:ahmad@NewYorkConsumerAttorney.com]
Sent: Tuesday, December 03, 2013 5:19 PM
To: ahmad@NewYorkConsumerAttorney.com; 'Lloyd Weinstein'; 'Ariana Lindermayer'; 'Deborah Ali'
Cc: lsglawoffices@verizon.net; 'Carolyn E. Coffey'
Subject: RE: FW: Tuhin v New York Motor Group, Inc., M&T Bank, et.al

1. Counsel will contact their clients to request that they retain electronic and other documents relevant to the parties, the alleged debt, the credit reporting/verification, the attempts to collect that debt and the claims and defenses raised in this lawsuit. To the degree possible, electronically stored information will be produced in both its electronic form and in a printed form. Pursuant to 26(f)(3)(D), the parties ask the court to include this agreement in an order.

The Law Office of Ahmad Keshavarz
16 Court St., 26th Floor, Brooklyn, NY 11241-1026
Phone: (718) 522-7900 Fax: (877) 496-7809
Website: www.NewYorkConsumerAttorney.com
Email: ahmad@NewYorkConsumerAttorney.com
Debt collection violations * Identity Theft * Deceptive car sales & financing scams

From: Ahmad Keshavarz [mailto:ahmad@NewYorkConsumerAttorney.com]
Sent: Wednesday, November 27, 2013 3:34 PM
To: 'Lloyd Weinstein'; 'Ariana Lindermayer'; 'Deborah Ali'
Cc: lsglawoffices@verizon.net; 'Carolyn E. Coffey'
Subject: RE: FW: Tuhin v New York Motor Group, Inc., M&T Bank, et.al

Here is the call in information:

Conference Dial-in Number: (559) 546-1000

Participant Access Code: 688763#

The Law Office of Ahmad Keshavarz
16 Court St., 26th Floor, Brooklyn, NY 11241-1026
Phone: (718) 522-7900 Fax: (877) 496-7809
Website: www.NewYorkConsumerAttorney.com
Email: ahmad@NewYorkConsumerAttorney.com
Debt collection violations * Identity Theft * Deceptive car sales & financing scams
From: Lloyd Weinstein [mailto:ljw@theweinsteingroup.net]
Sent: Wednesday, November 27, 2013 3:04 PM
To: Ariana Lindermayer; Deborah Ali
Cc: lsglawoffices@verizon.net; Carolyn E. Coffey; ahmad@NewYorkConsumerAttorney.com
Subject: Re: FW: Tuhin v New York Motor Group, Inc., M&T Bank, et.al

I am available on December 3, 2013 at 4:30 as well.

Lloyd.

On Wed, Nov 27, 2013 at 11:37 AM, Ariana Lindermayer <alindermayer@mfy.org> wrote:

Hello,

Plaintiff's counsel can do the telephone conference on December 3rd at 4:30. Does that time work for you?

Ariana

Ariana Lindermayer

Staff Attorney

MFY Legal Services, Inc.

299 Broadway, 4th Floor

New York, NY 10007

(212) 417-3742

alindermayer@mfy.org

www.mfy.org

Follow us on Twitter: twitter.com/MFYLegal

Begin forwarded message:

> **From:** "lsglawoffices@verizon.net" <lsglawoffices@verizon.net>
> **Date:** November 27, 2013, 9:11:15 AM EST
> **To:** <ccoffey@mfy.org>, <ahmad@NewYorkConsumerAttorney.com>, <ljw@theweinsteingroup.net>

Cc: <lsglawoffices@verizon.net>
Subject: Tuhin v New York Motor Group, Inc., M&T Bank, et.al
Reply-To: <lsglawoffices@verizon.net>

Counsel-as I advised plaintiffs' counsel, my office will be appearing for
M&T Bank and filing an answer by
the end of today. I have called co-defendants counsel's office twice but
have not spoken with him.
As discussed, Mag. Judge Pollak has scheduled a Court Conference for Dec.
12, 2013. Pursuant to that
Order counsel are to have a telephone conference by November 29, 2013
regarding disclosure.
That day falls within the Holiday weekend and I had originally requested of
plaintiffs' counsel (and the
reason for my call to NY Motor Group attorney)that the telephone conference
be rescheduled for Monday
December 2, 2013 provided the Court approves. After that discussion I noted
that I will be out of the office
on that date in two different Courts. Given that engagement and the request
that my inhouse counsel
participate in the telephone conference also, I am requesting that the
telephone conference be scheduled
for Tuesday Decemeber 3, 2013 in the afternoon instead of December 2, 2013,
if the Court consents to the
change. I will send the letter to the Court today and am requesting each
of the above counsel's acceptance
of this schedule. Could each counsel acknowledge accpetance of this by an
email to my office at your
earliest convenience. Thank you. Lance Grossman

----

myhosting.com - Premium Microsoft® Windows® and Linux web and application hosting - http://link.myhosting.com/myhosting

--

THE WEINSTEIN GROUP, P.C.

Lloyd J. Weinstein, Esq.
The Weinstein Group, PC

Three Crossways Park Drive West
Woodbury, New York 11797
Tel: (516) 802 5330
Fax: (516) 802 5332

3556 Main Street, Second Floor
Manchester, Vermont 05254
Tel: (802) 768 1095
Efax: (631) 415 0848

Our transmission of documents by electronic means is intended as a courtesy only. The use of this format does not constitute our consent to accept service of pleadings or process via electronic means, and such service is expressly refused. The accompanying transmission and any attachment is a confidential communication. As such, it may constitute attorney's work product, an attorney-client communication or other privileged information. It is intended to be viewed and read only by the individual or entity named herein.